

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND  
5 POST OFFICE SQUARE, BOSTON, MA 02109-3912**

**MEMORANDUM**

**DATE:** DRAFT: January 30, 2014  
FINAL: February 25, 2014

**SUBJ:** Inspection Report: TSCA Sections 402(c) Compliance Inspection of  
Brady Sullivan Properties, LLC, Manchester, New Hampshire

**FROM:** Alexander Aman, Environmental Engineer  
Toxics and Pesticides Unit, US EPA R1

**THRU:** Stephanie Carr, Senior Enforcement Coordinator  
Toxics and Pesticides Unit, US EPA R1

**TO:** File

**I. General Information**

- A. Firm: Brady Sullivan Properties, LLC  
670 North Commercial Street  
Manchester, NH 03101
- B. Location of Inspection:  
670 North Commercial Street  
Manchester, NH 03101
- C. Date of Inspection: January 29, 2014
- D. Personnel Participating in Inspection:  
Alexander Aman, Inspector, US EPA R1  
Marc A. Pinard, Esq., General Counsel, Brady Sullivan Properties, LLC  
David Brady, Principle, Brady Sullivan Properties, LLC  
Larry St. Pierre, Senior Project Manager, Brady Sullivan Properties, LLC  
Les A. Cartier, Environmental Consultant, Les A. Cartier and Associates Inc.  
Dianne Cartier, Environmental Consultant, Les A. Cartier and Associates Inc.

## **II. Purpose of the Inspection and Background Information**

Brady Sullivan Properties, LLC ("BS") came to the attention of the Environmental Protection Agency ("EPA") through a December 10, 2013 referral from the New Hampshire Healthy Homes and Lead Poisoning Prevention Program (Attachment 1). The referral referenced a complaint from a tenant of a commercial unit undergoing renovation at a BS-owned building located at 195 McGregor Street in Manchester, New Hampshire (the "Property"). EPA Inspector Alexander Aman called the complainant who provided EPA with a copy of results from lead testing performed in response to the complaint (Attachment 2). Mr. Aman also contacted BS and requested information concerning the renovation activities detailed in the complaint. Mr. Aman had numerous phone and email contacts with BS (Attachment 3) who provided some of the requested information and arranged for an EPA inspection on January 29, 2014 at 3:30 p.m. at the BS offices located at 670 North Commercial Street in Manchester, New Hampshire.

The January 29, 2014 EPA inspection of Brady Sullivan Properties, LLC was conducted to document and determine compliance with federal laws regarding lead exposure reduction and childhood lead poisoning prevention that EPA enforces, along with their implementing regulations, including Section 402 of TSCA, the Renovation, Repair and Painting ("RRP") Rule which amended 40 C.F.R. Part 745, Subparts E and L.

## **III. Opening Conference**

At approximately 2:30 p.m. on January 29, 2014 EPA Inspector Alexander Aman arrived at the Property and parked his car in the northwest corner of the eastern parking lot directly adjacent to the commercial unit occupied by Extra Space Storage. Mr. Aman took pictures of the exterior of the property (Attachment 4) until his camera ran out of battery power. Mr. Aman did not observe ongoing renovation activities on the northwest portion of the property. Mr. Aman drove to the east side of the property and observed evidence of ongoing renovation activity on the central and southern external portions of the west side of the main building. Mr. Aman observed evidence of ongoing renovation activity on the central and southern internal portions of the east side of the main building and on the internal portions of the annex. Mr. Aman also observed an individual on a power lift preparing to install a window in an opening on the first floor exterior of the east side of the property. Mr. Aman did not observe plastic sheeting, other containment measures, or signs in the work area. Mr. Aman did not observe active disturbance of painted surfaces.

Mr. Aman arrived at 670 North Commercial Street in Manchester, New Hampshire at approximately 3:30 p.m. and was met by an individual who introduced himself as Marc A. Pinard, General Counsel for BS. Mr. Pinard led Mr. Aman to a conference room where he introduced: David Brady, a Principle Owner of BS; Larry St. Pierre, Senior Project Manager for BS; Les A. Cartier, Environmental Consultant for Les A. Cartier and Associates Inc.; and Dianne Cartier, Environmental Consultant for Les A. Cartier and Associates Inc. Mr. Aman identified himself, presented his credentials, explained the purpose of the inspection, and the authority under which it was being conducted.



#### **IV. RRP Rule Inspection**

Mr. Pinard explained that BS was aware of the RRP Rule and its requirements. Mr. Pinard also explained that the renovation activities impacting residential areas of the Property did not disturb painted surfaces. Mr. Aman explained that, according to the RRP Rule, the definition of painted surfaces includes other surface coatings including polyurethane. Mr. Pinard explained that BS was aware of this distinction and again explained that no painted surfaces were disturbed during renovation activities impacting the residential areas of the Property.

Mr. Aman provided compliance assistance concerning the draft regulations proposed by EPA to regulate the renovation, repair, and painting of public and commercial buildings. Mr. Aman informed BS of the scheduled promulgation date of July, 2015. Mr. Pinard stated that BS was aware of the ongoing EPA rule making concerning the renovation, repair, and painting of public and commercial buildings.

Mr. Aman requested and Mr. Pinard provided a copy of the "Site Locus" of the Property as a reference (Attachment 5).

Mr. Pinard, Mr. Brady, Mr. St. Pierre, Mr. Cartier, Ms. Cartier provided a detailed narrative of the activities at the Property and Mr. Aman asked detailed questions concerning compliance with the RRP Rule. The information provided during the inspection is summarized in the attached Inspection Question and Response Notes (Attachment 6). During the inspection Mr. Aman provided general and activity specific compliance assistance.

#### **V. Closing Conference**

Mr. Aman verbally summarized the RRP Rule information provided by BS during the inspection, explained possible deficiencies and provided further compliance assistance.

Mr. Aman advised BS to, before beginning future renovation activities, document the presence or absence of painted surfaces and any potential lead hazards. Mr. Aman explained that this documentation could be generated in a number of ways including by a licensed risk assessor or lead inspector.

Mr. Aman clarified that EPA considers renovations of common areas, in a portion of a building that is generally accessible to all residents or users of the residential portion of the building, to be subject to the RRP Rule Requirements. Mr. Pinard explained that BS was aware of this requirement.

Mr. Pinard then signed the TSCA Notice of Inspection (Attachment 7). Mr. Aman explained the TSCA Inspection Confidentiality Notice ("CBI Notice") which Mr. Pinard then signed (Attachment 8). Mr. Pinard then signed the Receipt For Documents (Attachment 9). Mr. Aman then ended the inspection at approximately 4:30 pm.

#### **Attachments**

**List of Attachments:**

1. Pre-inspection complaint referral and email communications between Inspector Aman and New Hampshire Healthy Homes and Lead Poisoning Prevention Program
2. Pre-inspection email communications between Inspector Aman and the complainant
3. Pre-inspection email communications between Inspector Aman and Brady Sullivan Properties, LLC
4. List and copies of photos taken by Inspector Aman of the ongoing renovation activities at the Property
5. Copy of Site Locus of Property with annotations by Inspector Aman
6. Inspection Question and Response Notes
7. Signed TSCA Notice of Inspection form
8. Completed TSCA Inspection Confidentiality Notice form
9. Signed Receipt For Documents form and associated documents

# **Attachment 3**

**Pre-inspection email communications between  
Inspector Aman and Brady Sullivan Properties,  
LLC**

## Aman, Alexander

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**From:** Scott Payrits [spayrits@bradysullivan.com]  
**Sent:** Tuesday, December 17, 2013 11:12 AM  
**To:** Aman, Alexander  
**Subject:** 195 McGregor Street

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Alexander,

Thanks for the call yesterday regarding the concerns the Extra Space Storage tenant reported to your office. As I explained on the phone, this space is being rented out to Extra Space and the storage unit the customer is renting is directly through them, not Brady Sullivan. Considering how different the story is that was reported to you compared to the information that was relayed to us, I'd request that any questions you have regarding the 195 McGregor building (Extra Space Storage space in particular) be sent to us in writing so that we can contact the appropriate parties involved.

I don't want to bear the cost I will be charged by our Environmental consultant to respond to what we consider baseless frivolous accusations made by one of our Tenants clients in a space we don't even control. Obviously due to the conflicting stories you and I have been provided, the accusations being made are not reliable and in my opinion a method to receive some financial compensation that is not warranted.

### **Scott Payrits**

Director, Commercial Property Management

Brady Sullivan Properties  
670 North Commercial Street  
Suite 303  
Manchester, NH 03101  
(P): 603.296.4740  
(M): 603.851.4425  
(F): 603.622.7342

[www.bradysullivan.com](http://www.bradysullivan.com)



## Aman, Alexander

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**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Thursday, January 02, 2014 9:48 AM  
**To:** Aman, Alexander  
**Cc:** Scott Payrits; Maryann Finocchiaro  
**Subject:** 195 McGregor Street

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman, I am investigating this matter further and expect to have our response to you by end of business tomorrow. Please let me know if you have any questions in the meantime.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

Direct Line: 603 657-9715  
Main No.: 603 622-6223  
Cellular: 603 231-1289  
Fax: 603 622-7342

## Aman, Alexander

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**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Friday, January 03, 2014 4:48 PM  
**To:** Aman, Alexander  
**Cc:** Scott Payrits; Maryann Finocchiaro  
**Subject:** RE: 195 McGregor Street

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman, my intention to get you a response to your inquiry regarding 195 McGregor Street was derailed by an unavoidable trip out of state today. My new goal is to get you a response this Monday the 6th. Please feel free to call my cell number below if you'd like to speak in the meantime. Thanks for your understanding in connection with this slight delay.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

Direct Line: 603 657-9715  
Main No.: 603 622-6223  
Cellular: 603 231-1289  
Fax: 603 622-7342

---

**From:** Marc Pinard  
**Sent:** Thursday, January 02, 2014 9:48 AM  
**To:** aman.alexander@epa.gov  
**Cc:** Scott Payrits; Maryann Finocchiaro  
**Subject:** 195 McGregor Street

Mr. Aman, I am investigating this matter further and expect to have our response to you by end of business tomorrow. Please let me know if you have any questions in the meantime.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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Fax: 603 622-7342



## Aman, Alexander

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**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Monday, January 06, 2014 5:03 PM  
**To:** Aman, Alexander  
**Cc:** Maryann Finocchiaro; Scott Payrits  
**Subject:** 195 McGregor Street

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman, below I have provided responses in red after your questions. Some of the questions require further research and I have indicated the same where applicable. I have also included additional information relative to this matter below. As noted below, the primary purpose of this response is to address the matters relative to Extra Space Storage Unit Q103. My next response will address the broader scope of your questions which I will be better prepared to answer following my additional research.

Please provide me the following information and answer the following questions concerning the activities at 195 McGregor Street in Manchester, NH (the "Property"):

- Provide the location of the specific areas of the Property impacted by the renovation activities (an annotated map is acceptable); The location of the specific area of the property impacted in connection with this inquiry is Unit Q103 within the Extra Space Storage Premises. By separate message we will provide you with a floor plan which further identifies this area.
- Provide the current use and function (residential, commercial/office space, commercial/storage space, etc.) of each of the areas of the Property impacted by the renovation activities and indicate which if any of these areas contain target housing or child occupied facilities as defined by 40 CFR § 745.223; The impacted area is commercial storage space.
- Are the components impacted by the renovation activities within the Extra Space Storage facility located directly adjacent to target housing or child occupied facilities including common areas? No
- Provide the contact information for all Brady Sullivan Properties tenants (you do not need to include any sublessees) for the specific areas of the Property impacted by the renovation activities; The sole tenant impacted is Extra Space Storage c/o Brett Nelson, Esquire 801 365 4641
- Provide the contact information for the entities who performed or were otherwise responsible for the renovation activities including the name and contact information for the individual from each entity who is most familiar with the execution and environmental compliance of the renovation activities at the Property; I must look into this further and provide by subsequent response.
- Provide a description of the specific type of renovation activities (window removal, masonry repair, etc.) for each of the areas of the Property impacted by the renovation; Plywood covering a window opening near storage unit Q103 was removed and a new window was installed in that window frame.
- Provide the general start and completion dates for the renovation activities at the Property; I will have to obtain the date of the window installation and provide it to you. I will also have to provide you with the dates relative to the residential fit up that is also ongoing at the Property.
- Provide the start and completion dates for the renovation activities impacting the Extra Space Storage portion of the Property I will have to obtain and provide these dates to you.
- Provide copies of all complaints received by Brady Sullivan Properties concerning the recent renovation activities at the Property; I am not aware of any complaints other than that relative to Storage Unit Q103. I will provide you by a subsequent email a copy of that complaint and others received, if any.
- Are Brady Sullivan Properties or the entities who performed or were otherwise responsible for the renovation activities aware of any potential health hazards involving lead based paint hazards that were generated by the renovation activities at the Property? Brady Sullivan is aware of the risks associated with lead based paint and its employees working in this area are OSHA 30 certified. Contractors dealing with lead are similarly aware of the risks.

- If so describe these potential health hazards, how you became aware of them, and any steps that have been taken to address them; As noted above, all employees who work in this area are OSHA 30 certified. I have also dealt directly with Ronnie Levin of the EPA's Boston Office in connection with Compliance Inspections relative to some of Brady Sullivan's residential units. We are aware of the potential hazards of lead and comply with the laws and regulations relative thereto.
- For all recent renovation activities impacting target housing or child occupied facilities and any adjacent areas including common areas located at the Property; None of the activities have impacted target housing or child occupied facilities so the following sub parts to this question are not applicable.
  - Were painted surfaces or surfaces covered in part or in whole with other surfaces coatings disturbed?
    - If so describe the specific type of renovation activity performed and approximately how large of an area in square feet was disturbed;
  - If testing was performed to determine the presence of lead based paint, provide a summary of all results for the impacted target housing or child occupied facilities;
  - Were any of the Renovation, Repair and Painting ("RRP") Rule (40 CFR 745 Subpart E) requirements followed?
    - If so please describe which requirements were followed.

In further response to your inquiry, the installation of the window near Storage Unit Q103 apparently resulted in some debris getting into that secured storage unit but Brady Sullivan was not provided access to clean the area despite offering to do so. Any common areas affected by this work were cleaned by Brady Sullivan personnel. We will request that Extra Space Storage ask their other tenants if they have any debris in their units and if they do we will clean the same if provided access to do so.

In my next response to you I will provide further information relative to any additional impact that work at the Property has had other than that impact at Storage Unit Q103. As noted above, the primary purpose of this response is to provide you information relative to the Storage Q103 matter and my subsequent response to you will address the broader scope of your questions.

Please feel free to contact me to discuss these matters at your convenience.

Marc A. Pinard, Esq.  
 General Counsel  
 Brady Sullivan Properties, LLC  
 670 N. Commercial Street  
 Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

Direct Line: 603 657-9715  
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 Cellular: 603 231-1289  
 Fax: 603 622-7342



**Aman, Alexander**

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**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Wednesday, January 08, 2014 5:13 PM  
**To:** Aman, Alexander  
**Subject:** 195 McGregor Street, Manchester, NH

Mr. Aman, I have met with the project manager and will prepare a further response tomorrow. I will get that out to you as soon as possible. Thanks for your patience.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

Direct Line: 603 657-9715  
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Fax: 603 622-7342



## Aman, Alexander

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**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Thursday, January 09, 2014 2:22 PM  
**To:** Aman, Alexander  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street, Manchester, New Hampshire

Mr. Aman, this message is to supplement the message that I sent you on the 6<sup>th</sup> of January. That message dealt with specifics as to the Extra Space Storage Unit Q103 complaint. This message deals with the broader scope of renovations at the Property.

As with my last message, below I have provided responses in red after your questions. Some of the questions require further follow up regarding information I am still waiting to receive. I have indicated the same where applicable and will get you that additional information as soon as I have it.

Please provide me the following information and answer the following questions concerning the activities at 195 McGregor Street in Manchester, NH (the "Property"):

- Provide the location of the specific areas of the Property impacted by the renovation activities (an annotated map is acceptable); The location of the renovations is the third and fourth floors of the north end of the Property. The renovation area is approximately 480 feet long and 100 feet wide. The renovation has converted those third and fourth floor areas from vacant mill space to residential apartments. The only unit that abuts these renovation areas is the Extra Space Storage premises on the second floor of the Property. (Confirm with Charles whether another unit abuts the large apartment at the south end) If I am able to provide a floor plan showing these areas, I will send it to you separately.
- Provide the current use and function (residential, commercial/office space, commercial/storage space, etc.) of each of the areas of the Property impacted by the renovation activities and indicate which if any of these areas contain target housing or child occupied facilities as defined by 40 CFR § 745.223; The only impacted area is commercial storage space, that being the Extra Space Storage Premises. There is no target housing or child occupied facilities at the Property. The new residential apartments that are the subject of the renovation are not occupied yet.
- Are the components impacted by the renovation activities within the Extra Space Storage facility located directly adjacent to target housing or child occupied facilities including common areas? No
- Provide the contact information for all Brady Sullivan Properties tenants (you do not need to include any sublessees) for the specific areas of the Property impacted by the renovation activities; The sole tenant impacted is Extra Space Storage c/o Brett Nelson, Esquire 801 365 4641.
- Provide the contact information for the entities who performed or were otherwise responsible for the renovation activities including the name and contact information for the individual from each entity who is most familiar with the execution and environmental compliance of the renovation activities at the Property; I have requested this information and will provide to you by supplemental response.
- Provide a description of the specific type of renovation activities (window removal, masonry repair, etc.) for each of the areas of the Property impacted by the renovation; The Property was purchased by Brady Sullivan in a condition in which the renovation area had previously been sandblasted by the prior owner so no sandblasting was required in connection with the renovation. The prior owner had also replaced the majority of the windows at the property. The only other windows requiring installation were in connection with window frame areas covered with plywood. The renovation involved installation of approximately 15 windows in frames that were covered with plywood. The renovation also involved masonry repointing and brick work on the interior areas. The renovation involved construction of the residential units including,



framing, plumbing, electrical, heating, sheetrock, carpet and flooring and related finish work. All heating systems at the property, including those in the renovation area are segregated by unit. Accordingly, there is no shared air flow between any units based on HVAC systems being solely dedicated to units throughout the Property.

- Provide the general start and completion dates for the renovation activities at the Property; The renovations began at the beginning of calendar year 2013 and are in the process of being finalized currently. A Certificate of Occupancy for the residential units is expected to be issued in the very near term, following a final inspection by the Manchester Fire Department. All other City departments have approved the renovations for the issuance of the Certificate of Occupancy.
- Provide the start and completion dates for the renovation activities impacting the Extra Space Storage portion of the Property. The work in the Extra Space Storage portion of the Property has been periodic over the course of the entire renovation period described above.
- Provide copies of all complaints received by Brady Sullivan Properties concerning the recent renovation activities at the Property; I am in the process of determining if there have been any complaints submitted other than that which related to Storage Unit Q103. I will provide you by a subsequent email a copy of any and all complaints received following this follow up research.
- Are Brady Sullivan Properties or the entities who performed or were otherwise responsible for the renovation activities aware of any potential health hazards involving lead based paint hazards that were generated by the renovation activities at the Property? Brady Sullivan is aware of the risks associated with lead based paint and its employees working in this area are OSHA 30 certified. To our knowledge, Contractors dealing with lead are similarly aware of the risks, however that would have to be determined on a case by case basis.
  - If so describe these potential health hazards, how you became aware of them, and any steps that have been taken to address them; As noted above, all employees who work in this area are OSHA 30 certified. I have also dealt directly with Ronnie Levin of the EPA's Boston Office in connection with Compliance Inspections relative to some of Brady Sullivan's residential units at other properties. We are aware of the potential hazards of lead and comply with the laws and regulations relative thereto. With respect to the Extra Space Storage Complaint, Brady Sullivan has offered to have dust properly cleaned from storage items, but that offer has not yet been accepted. Brady Sullivan continues to be willing to have dust properly cleaned from any storage items in the storage facility.
- For all recent renovation activities impacting target housing or child occupied facilities and any adjacent areas including common areas located at the Property; None of the activities have impacted target housing or child occupied facilities so the following sub parts to this question are not applicable.
  - Were painted surfaces or surfaces covered in part or in whole with other surfaces coatings disturbed?
    - If so describe the specific type of renovation activity performed and approximately how large of an area in square feet was disturbed;
  - If testing was performed to determine the presence of lead based paint, provide a summary of all results for the impacted target housing or child occupied facilities;
  - Were any of the Renovation, Repair and Painting ("RRP") Rule (40 CFR 745 Subpart E) requirements followed?
    - If so please describe which requirements were followed.

As noted above, I shall provide additional information as I obtain it. I am actively seeking all such information. Please feel free to contact me to further discuss this matter at your convenience.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street

Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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Fax: 603 622-7342



## Aman, Alexander

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**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Friday, January 10, 2014 8:37 AM  
**To:** Aman, Alexander  
**Cc:** Maryann Finocchiaro  
**Subject:** RE: 195 McGregor Street, Manchester, New Hampshire

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

You're welcome. The parenthetical statement in the first response is a reminder for me to confirm matters relative to abutting units. Sorry if that caused any confusion for you. I hope to have all follow up information to you early next week.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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Fax: 603 622-7342

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**From:** Aman, Alexander [mailto:Aman.Alexander@epa.gov]  
**Sent:** Thursday, January 09, 2014 6:41 PM  
**To:** Marc Pinard  
**Cc:** Maryann Finocchiaro  
**Subject:** RE: 195 McGregor Street, Manchester, New Hampshire

Mr. Pinard,

Thank you for sending me this information. I will contact you with any follow-up questions after I have reviewed this response and the additional requested information which you have yet to send.

Sincerely,

Alexander Aman  
Environmental Engineer  
Phone: (617) 918-1722 | Fax: (617) 918-0722

Toxics and Pesticides Unit  
U.S. EPA - Region 1 (New England)  
5 Post Office Square, Suite 100  
Mail Code OES 05-4  
Boston, MA 02109-3912

Please consider the environment before printing this email.

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**From:** Marc Pinard [mailto:mpinard@bradysullivan.com]  
**Sent:** Thursday, January 09, 2014 2:22 PM

**To:** Aman, Alexander  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street, Manchester, New Hampshire

Mr. Aman, this message is to supplement the message that I sent you on the 6<sup>th</sup> of January. That message dealt with specifics as to the Extra Space Storage Unit Q103 complaint. This message deals with the broader scope of renovations at the Property.

As with my last message, below I have provided responses in red after your questions. Some of the questions require further follow up regarding information I am still waiting to receive. I have indicated the same where applicable and will get you that additional information as soon as I have it.

Please provide me the following information and answer the following questions concerning the activities at 195 McGregor Street in Manchester, NH (the "Property"):

- Provide the location of the specific areas of the Property impacted by the renovation activities (an annotated map is acceptable); The location of the renovations is the third and fourth floors of the north end of the Property. The renovation area is approximately 480 feet long and 100 feet wide. The renovation has converted those third and fourth floor areas from vacant mill space to residential apartments. The only unit that abuts these renovation areas is the Extra Space Storage premises on the second floor of the Property. (Confirm with Charles whether another unit abuts the large apartment at the south end) If I am able to provide a floor plan showing these areas, I will send it to you separately.
- Provide the current use and function (residential, commercial/office space, commercial/storage space, etc.) of each of the areas of the Property impacted by the renovation activities and indicate which if any of these areas contain target housing or child occupied facilities as defined by 40 CFR § 745.223; The only impacted area is commercial storage space, that being the Extra Space Storage Premises. There is no target housing or child occupied facilities at the Property. The new residential apartments that are the subject of the renovation are not occupied yet.
- Are the components impacted by the renovation activities within the Extra Space Storage facility located directly adjacent to target housing or child occupied facilities including common areas? No
- Provide the contact information for all Brady Sullivan Properties tenants (you do not need to include any sublessees) for the specific areas of the Property impacted by the renovation activities; The sole tenant impacted is Extra Space Storage c/o Brett Nelson, Esquire 801 365 4641.
- Provide the contact information for the entities who performed or were otherwise responsible for the renovation activities including the name and contact information for the individual from each entity who is most familiar with the execution and environmental compliance of the renovation activities at the Property; I have requested this information and will provide to you by supplemental response.
- Provide a description of the specific type of renovation activities (window removal, masonry repair, etc.) for each of the areas of the Property impacted by the renovation; The Property was purchased by Brady Sullivan in a condition in which the renovation area had previously been sandblasted by the prior owner so no sandblasting was required in connection with the renovation. The prior owner had also replaced the majority of the windows at the property. The only other windows requiring installation were in connection with window frame areas covered with plywood. The renovation involved installation of approximately 15 windows in frames that were covered with plywood. The renovation also involved masonry repointing and brick work on the interior areas. The renovation involved construction of the residential units including, framing, plumbing, electrical, heating, sheetrock, carpet and flooring and related finish work. All heating systems at the property, including those in the renovation area are segregated by unit. Accordingly, there is no shared air flow between any units based on HVAC systems being solely dedicated to units throughout the Property.



- Provide the general start and completion dates for the renovation activities at the Property; The renovations began at the beginning of calendar year 2013 and are in the process of being finalized currently. A Certificate of Occupancy for the residential units is expected to be issued in the very near term, following a final inspection by the Manchester Fire Department. All other City departments have approved the renovations for the issuance of the Certificate of Occupancy.
- Provide the start and completion dates for the renovation activities impacting the Extra Space Storage portion of the Property The work in the Extra Space Storage portion of the Property has been periodic over the course of the entire renovation period described above.
- Provide copies of all complaints received by Brady Sullivan Properties concerning the recent renovation activities at the Property; I am in the process of determining if there have been any complaints submitted other than that which related to Storage Unit Q103. I will provide you by a subsequent email a copy of any and all complaints received following this follow up research.
- Are Brady Sullivan Properties or the entities who performed or were otherwise responsible for the renovation activities aware of any potential health hazards involving lead based paint hazards that were generated by the renovation activities at the Property? Brady Sullivan is aware of the risks associated with lead based paint and its employees working in this area are OSHA 30 certified. To our knowledge, Contractors dealing with lead are similarly aware of the risks, however that would have to be determined on a case by case basis.
  - If so describe these potential health hazards, how you became aware of them, and any steps that have been taken to address them; As noted above, all employees who work in this area are OSHA 30 certified. I have also dealt directly with Ronnie Levin of the EPA's Boston Office in connection with Compliance Inspections relative to some of Brady Sullivan's residential units at other properties. We are aware of the potential hazards of lead and comply with the laws and regulations relative thereto. With respect to the Extra Space Storage Complaint, Brady Sullivan has offered to have dust properly cleaned from storage items, but that offer has not yet been accepted. Brady Sullivan continues to be willing to have dust properly cleaned from any storage items in the storage facility.
- For all recent renovation activities impacting target housing or child occupied facilities and any adjacent areas including common areas located at the Property; None of the activities have impacted target housing or child occupied facilities so the following sub parts to this question are not applicable.
  - Were painted surfaces or surfaces covered in part or in whole with other surfaces coatings disturbed?
    - If so describe the specific type of renovation activity performed and approximately how large of an area in square feet was disturbed;
  - If testing was performed to determine the presence of lead based paint, provide a summary of all results for the impacted target housing or child occupied facilities;
  - Were any of the Renovation, Repair and Painting ("RRP") Rule (40 CFR 745 Subpart E) requirements followed?
    - If so please describe which requirements were followed.

As noted above, I shall provide additional information as I obtain it. I am actively seeking all such information. Please feel free to contact me to further discuss this matter at your convenience.

Marc A. Pinard, Esq.  
 General Counsel  
 Brady Sullivan Properties, LLC  
 670 N. Commercial Street



Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

Direct Line: 603 657-9715  
Main No.: 603 622-6223  
Cellular: 603 231-1289  
Fax: 603 622-7342

## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Tuesday, January 14, 2014 2:39 PM  
**To:** Aman, Alexander  
**Cc:** Maryann Finocchiaro  
**Subject:** RE: 195 McGregor Street, Manchester, New Hampshire

Dear Mr. Aman, thanks for the follow up message. As I mentioned on the phone, although your written request came in on the 23<sup>rd</sup>, Brady Sullivan was closed for the holidays and reopened on the second of January. Accordingly, we are only two weeks into the period when we were able to begin responding in earnest.

Our project administrator is putting together the list of contact information for the entities which performed or were otherwise responsible for renovations. I expect that I will have that for you in the morning, but I will try to meet your deadline of today. A subpoena will not be necessary as we have been responsive and will continue to be responsive to your inquiries.

I will also respond to your additional written request below shortly.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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Cellular: 603 231-1289  
Fax: 603 622-7342

---

**From:** Aman, Alexander [mailto:Aman.Alexander@epa.gov]  
**Sent:** Tuesday, January 14, 2014 10:26 AM  
**To:** Marc Pinard  
**Subject:** RE: 195 McGregor Street, Manchester, New Hampshire

Mr. Pinard,

Thank you for briefly discussing this matter with me today.

During our phone conversation we discussed my concerns that Brady Sullivan has not yet provided a full response to the 12/16/13 verbal request for information or the 12/23/13 written request for information. Specifically EPA has requested the contact information for the entities who performed or were otherwise responsible for the renovation activities. You indicated that you would try to provide me with this information by the end of the day today. This information is very important for timely and appropriate EPA response to the complaint we received. As we discussed, EPA may issue a subpoena to compel your response.

During the phone call I clarified that a renovation performed for the purpose of converting a building, or part of a building, into target housing or a child-occupied facility is a renovation for purposes of the RRP Rule. Specifically, I clarified the intent of a number of questions in my 12/23/13 written request for information to include these types of renovation activities. I have provided revised questions below.

## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Tuesday, January 14, 2014 7:02 PM  
**To:** Aman, Alexander  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street Contacts  
**Attachments:** 195 McGregor Street Contractor Contact List 011414.xls

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr. Aman, attached is the list of contractor contacts for the renovations at 195 McGregor Street in Manchester, NH. This list represents those involved in the apartment renovations other than the General Contractor, which was Brady Sullivan. The Brady Sullivan Project Manager was Larry St. Pierre and he can be reached through me. If you 'd like to speak with Mr. St. Pierre, please let me know. I will respond to your remaining pending inquiries shortly.

Marc A. Pinard, Esq.  
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Fax: 603 622-7342



Vendor Name	Performed	Address	Contact	Phone	Fax	Email
AmericanDry basement	Ceilings					
Architectural Fireplaces, Inc.	Fireplaces	15 Colonial Dr, E. Hampstead, NH 03826	Liz DiTommaso	603-362-0020	603-362-0022	liz@arc-fire.com
C&C Flooring	Flooring	1600 Candia Rd, Ste 8, Manchester, NH 03109	Chris Colburn	603-396-3275	603-606-2993	ccflooringnh@yahoo.com
Contract Window Fashions	Blinds		Guy Guerra	603-475-1961	603-218-7007	GJGHD49@aol.com
DB Perry	Painting	855 Hanover St, Ste 293, Manchester, NH 03104	Dave Perry	603-785-3244		dbperryinc@gmail.com
DBCi	Storage Units	Douglasville, GA	Lonnie Hatcher	800-542-0501	678-501-3003	lonnieh@dbci.com
EcoStone	Countertops	64 Oak Street, Milford, NH 03055	Josh Tannariello	603-459-9378		
Emonds Plumbing	Plumbing&HVAC	104 Dean Street, Tauton, MA 02780	Scott Simmonds	774-930-5882	508-880-7756	
Energy Electric	Electric	740 Quaker Highway, Uxbridge, MA 01569	Bruce Dubeau	401-641-1419	508-278-3229	bdubeau@energyelectricne.com
Ferguson	Appliances	400 Lynnway, Lynn, MA 01901	Michael DelConte	617-719-1664		Michael.Delconte@Ferguson.com
FGF CONS	Steel Erection	26 Kendall Pond Rd, Derry, NH 03038	Skip Gelineas	603-380-2162	603-216-5980	
Fire Protection	Sprinkler	PO Box 5886, Manchester, NH 03108	Rick Hunt	603-822-6148	603-232-5461	fireprotectiontech@comcast.net
Granite State Glass	Storefront Hardware & Glazing	162 Lowell Road, Hudson, NH 03051	Craig Urquhart	603-598-3574	603-598-6710	curquhartsg@comcast.net
Harvey Concrete	Slabs	26 Garrison Drive, Bedford, NH 03110	Walter Szule	603-472-3111		
IPS	Rough Carpentry - Framing and Drywall	1333 Boston Post Rd, Old Saybrook, CT 06475	Luis Peralta	860-304-6063		ipsllc200538@yahoo.com
NH Cabinet - Marc Dube	Cabinet Installation	605 Belmont Street, Manchester, NH 03104	Marc Dube	603-703-3107		nhcabinets@live.com
Otis Elevator Company	Elevator	35 Bradley Drive, Westbrook, ME 04092	John Meyer	207-856-2737		
PA Iron	Metal Fabrication	02 Draper St #U6, Woburn, MA 01801	Passos	781-367-7389		pairondesign@live.com
Quality Insulation:	Bath Accessories	110 Perimeter Road, Nashua, NH 03063	Roland Picard	603-324-1322		roland.picard@mascoacs.com
	Supply&Install Fireplaces					
	Shelving					
	Waterproofing					
Spectrum Floors	Flooring	1600 Candia Road, Manchester, NH 03109	Scott Richards	603-626-3998	603-626-0260	srichards@spectrumfloorsnh.com
Universal Décor	Install/Labor - Rough Carpentry	10 Riddle Drive, Bedford, NH 03110	Rick Galipeault	603-845-8508	603-622-7342	galico@yahoo.com
	Install/Labor Finish Carpentry					
	Install/Labor Flooring					
	Fireplace Mantels					
	Sanding					
McLaughlin Masonry	Masonry	152 Allston Street, West Medford, MA 02155	Terry McLaughlin	617-699-6221		mclaughlin@comcast.net

## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Wednesday, January 15, 2014 7:18 PM  
**To:** Aman, Alexander; Larry St. Pierre  
**Cc:** Marc Pinard; Maryann Finocchiaro  
**Subject:** Re: 195 McGregor Street Contacts

Mr. Aman, I know of no legal counsel for any of the entities on the list I provided you. I represent Brady Sullivan only. By copy of this message I am asking Mr. St. Pierre for his availability to meet with you and me next Wednesday or Thursday in Manchester. No formal request is necessary. I will get back with you to schedule soon.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)  
Direct Line: 603 657-9715  
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Main No.: 603 622-6223  
Fax: 603 622-7342

On Jan 15, 2014, at 5:47 PM, "Aman, Alexander" <[Aman.Alexander@epa.gov](mailto:Aman.Alexander@epa.gov)> wrote:

Mr. Pinard,

Thank you for providing me with this information. Are you or any other Brady Sullivan legal counsel representing any of these companies in this matter? I would like to make sure that my follow-up communication with them is done appropriately.

I would like to meet with Mr. St. Pierre on Wednesday or Thursday of next week to review the information you have provided and conduct an inspection of additional information and documents related to the renovation operations. I can provide you with a formal notice of inspection if you wish.

Thank you again for the information you have provided so far. I will look for the remaining information and a response to my meeting request in the coming days. Please contact me if you have questions or concerns.

Sincerely,

Alexander Aman  
Environmental Engineer  
Phone: (617) 918-1722 | Fax: (617) 918-0722

Toxics and Pesticides Unit  
U.S. EPA - Region 1 (New England)  
5 Post Office Square, Suite 100  
Mail Code OES 05-4  
Boston, MA 02109-3912

Please consider the environment before printing this email.

---

**From:** Marc Pinard [<mailto:mpinard@bradysullivan.com>]  
**Sent:** Tuesday, January 14, 2014 7:02 PM  
**To:** Aman, Alexander  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street Contacts

Dear Mr. Aman, attached is the list of contractor contacts for the renovations at 195 McGregor Street in Manchester, NH. This list represents those involved in the apartment renovations other than the General Contractor, which was Brady Sullivan. The Brady Sullivan Project Manager was Larry St. Pierre and he can be reached through me. If you 'd like to speak with Mr. St. Pierre, please let me know. I will respond to your remaining pending inquiries shortly.

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## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Friday, January 17, 2014 11:53 AM  
**To:** Aman, Alexander; Larry St. Pierre  
**Cc:** Maryann Finocchiaro  
**Subject:** Meeting for 195 McGregor Street Review

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman, how about meeting at our office in Manchester at 9:00 am on Wednesday January 22? If that works for you I will confirm that Mr. St. Pierre is available to be here at that time. Thanks.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Friday, January 17, 2014 4:34 PM  
**To:** Aman, Alexander; Larry St. Pierre  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman, Brady Sullivan has had an environmental consultant involved in the 195 McGregor Street project since its inception and I thought it would be a good idea to have him at our meeting so that he could share his information with you also. Unfortunately he is out of town until the 27<sup>th</sup> of January. Do you agree that it would be a good idea to have him present at the meeting? If so, we'd have to postpone until he returns on the 27<sup>th</sup>. Please let me know your thoughts. Thanks.

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## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Tuesday, January 21, 2014 11:45 AM  
**To:** Aman, Alexander; Larry St. Pierre  
**Cc:** Maryann Finocchiaro; cartiergroup@metrocast.net  
**Subject:** RE: 195 McGregor Street Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman, I have not heard back from you regarding my message below. Can we schedule this meeting for after the 27<sup>th</sup> of January when our Environmental Consultant will be available to attend the meeting?

Marc A. Pinard, Esq.  
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**From:** Marc Pinard  
**Sent:** Friday, January 17, 2014 4:34 PM  
**To:** aman.alexander@epa.gov; Larry St. Pierre (lstpierre@bradysullivan.com)  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street Meeting

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## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Tuesday, January 21, 2014 4:05 PM  
**To:** Aman, Alexander; Larry St. Pierre  
**Cc:** Maryann Finocchiaro; cartiergroup@metrocast.net  
**Subject:** RE: 195 McGregor Street Meeting

Mr. Aman, because I have not heard from you regarding this meeting I am not going to have Mr. St. Pierre travel in tomorrow's weather from Rhode Island to Manchester. Please contact me to schedule this meeting for after January 27<sup>th</sup> so that our Environmental Consultant can be in attendance. If you need to speak with me, please call my cell number below. Thank you.

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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**From:** Marc Pinard  
**Sent:** Tuesday, January 21, 2014 11:45 AM  
**To:** [aman.alexander@epa.gov](mailto:aman.alexander@epa.gov); Larry St. Pierre ([lstpierre@bradysullivan.com](mailto:lstpierre@bradysullivan.com))  
**Cc:** Maryann Finocchiaro; cartiergroup@metrocast.net  
**Subject:** RE: 195 McGregor Street Meeting

Mr. Aman, I have not heard back from you regarding my message below. Can we schedule this meeting for after the 27<sup>th</sup> of January when our Environmental Consultant will be available to attend the meeting?

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**From:** Marc Pinard  
**Sent:** Friday, January 17, 2014 4:34 PM  
**To:** [aman.alexander@epa.gov](mailto:aman.alexander@epa.gov); Larry St. Pierre ([lstpierre@bradysullivan.com](mailto:lstpierre@bradysullivan.com))  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street Meeting

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## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Monday, January 27, 2014 8:03 AM  
**To:** Aman, Alexander; cartiergroup@metrocast.net; Larry St. Pierre  
**Cc:** Maryann Finocchiaro  
**Subject:** RE: 195 McGregor Street Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman, this Wednesday the 29<sup>th</sup> in the afternoon works for us and our environmental consultant. How about 2:00 pm at our office in Manchester? Please reply to all when responding. Thanks.

Marc A. Pinard, Esq.  
General Counsel  
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---

**From:** Aman, Alexander [mailto:Aman.Alexander@epa.gov]  
**Sent:** Friday, January 24, 2014 6:48 PM  
**To:** Marc Pinard  
**Subject:** RE: 195 McGregor Street Meeting

Mr. Pinard,

Earlier this week we had a phone conversation about scheduling a time for EPA to review information concerning 195 McGregor Street. I understand that you will be working to schedule something with your environmental consultant when he returns next week.

My availability next week has changed since last we spoke. I am now unavailable on Monday, Tuesday and Wednesday. I am available between 10 am and 3 pm on Thursday and Friday.

Please contact me if you have any questions.

Sincerely,

Alexander Aman  
Environmental Engineer  
Phone: (617) 918-1722 | Fax: (617) 918-0722

Toxics and Pesticides Unit  
U.S. EPA - Region 1 (New England)  
5 Post Office Square, Suite 100  
Mail Code OES 05-4  
Boston, MA 02109-3912

Please consider the environment before printing this email.

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**From:** Marc Pinard [<mailto:mpinard@bradysullivan.com>]

**Sent:** Tuesday, January 21, 2014 4:05 PM

**To:** Aman, Alexander; Larry St. Pierre

**Cc:** Maryann Finocchiaro; [cartiergroup@metrocast.net](mailto:cartiergroup@metrocast.net)

**Subject:** RE: 195 McGregor Street Meeting

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**From:** Marc Pinard

**Sent:** Tuesday, January 21, 2014 11:45 AM

**To:** [aman.alexander@epa.gov](mailto:aman.alexander@epa.gov); Larry St. Pierre ([lstpierre@bradysullivan.com](mailto:lstpierre@bradysullivan.com))

**Cc:** Maryann Finocchiaro; [cartiergroup@metrocast.net](mailto:cartiergroup@metrocast.net)

**Subject:** RE: 195 McGregor Street Meeting

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**To:** [aman.alexander@epa.gov](mailto:aman.alexander@epa.gov); Larry St. Pierre ([lstpierre@bradysullivan.com](mailto:lstpierre@bradysullivan.com))

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**Subject:** 195 McGregor Street Meeting



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## Aman, Alexander

---

**From:** Marc Pinard [mpinard@bradysullivan.com]  
**Sent:** Monday, January 27, 2014 8:46 AM  
**To:** Aman, Alexander; cartiergroup@metrocast.net; Larry St. Pierre  
**Cc:** Maryann Finocchiaro  
**Subject:** RE: 195 McGregor Street Meeting

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Mr. Aman I am having trouble getting everyone together for 2:00 on Wednesday. If we can get everyone together would 3:30 to 4:00 work for you on Wednesday?

Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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**Subject:** RE: 195 McGregor Street Meeting

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Environmental Engineer  
Phone: (617) 918-1722 | Fax: (617) 918-0722

Toxics and Pesticides Unit  
U.S. EPA - Region 1 (New England)  
5 Post Office Square, Suite 100  
Mail Code OES 05-4  
Boston, MA 02109-3912

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**Cc:** Maryann Finocchiaro; [cartiergroup@metrocast.net](mailto:cartiergroup@metrocast.net)  
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Main No.: 603 622-6223  
Cellular: 603 231-1289  
Fax: 603 622-7342

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**From:** Marc Pinard  
**Sent:** Tuesday, January 21, 2014 11:45 AM  
**To:** [aman.alexander@epa.gov](mailto:aman.alexander@epa.gov); Larry St. Pierre ([lstpierre@bradysullivan.com](mailto:lstpierre@bradysullivan.com))  
**Cc:** Maryann Finocchiaro; [cartiergroup@metrocast.net](mailto:cartiergroup@metrocast.net)  
**Subject:** RE: 195 McGregor Street Meeting

Mr. Aman, I have not heard back from you regarding my message below. Can we schedule this meeting for after the 27<sup>th</sup> of January when our Environmental Consultant will be available to attend the meeting?



Marc A. Pinard, Esq.  
General Counsel  
Brady Sullivan Properties, LLC  
670 N. Commercial Street  
Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

Direct Line: 603 657-9715  
Main No.: 603 622-6223  
Cellular: 603 231-1289  
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**From:** Marc Pinard  
**Sent:** Friday, January 17, 2014 4:34 PM  
**To:** [aman.alexander@epa.gov](mailto:aman.alexander@epa.gov); Larry St. Pierre ([lstpierre@bradysullivan.com](mailto:lstpierre@bradysullivan.com))  
**Cc:** Maryann Finocchiaro  
**Subject:** 195 McGregor Street Meeting

Mr. Aman, Brady Sullivan has had an environmental consultant involved in the 195 McGregor Street project since its inception and I thought it would be a good idea to have him at our meeting so that he could share his information with you also. Unfortunately he is out of town until the 27<sup>th</sup> of January. Do you agree that it would be a good idea to have him present at the meeting? If so, we'd have to postpone until he returns on the 27<sup>th</sup>. Please let me know your thoughts. Thanks.

Marc A. Pinard, Esq.  
General Counsel  
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Manchester, NH 03101  
[mpinard@bradysullivan.com](mailto:mpinard@bradysullivan.com)

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# **Attachment 4**

**List and copies of photos taken by Inspector Aman of the ongoing renovation activities at the Property**

## EPA Photograph/Video Log

1. Photographer:	Alexander Aman
2. Facility/Site Name and Address:	Brady Sullivan Properties, LLC @ 195 McGregor Street Manchester, New Hampshire
3. Facility EPA ID Number:	n/a
4. Type of camera/video device used:	Sony Digital Still Camera Model Number: DSC-HX1 Serial Number: 636683
5. Digital recording media:	Sony Memory Stick Pro Duo 4G Magic Gate Mark 2 MS-MT4G – BYEG10SS000
6. All digital photos were copied by:	Alexander Aman
7. All digital photos were copied to:	Printed copies to file G:\LEAD\Enforcement
8. Original copy is stored in:	TBD

### 9. Log

Date	Time	Photo Field Number and, for digital photos, the file name	Description of Image and Any Comments on Conditions
01/29/14	2:37 pm	# 1 - DSC00797	Northwest side of main building from parking lot looking northeast.
01/29/14	3:36 pm	# 2 - DSC00798	Northwest side of main building from parking lot looking east.
01/29/14	3:36 pm	# 3 - DSC00799	Northwest side of main building from parking lot looking southeast.
01/29/14	4:27 pm	# 4 - DSC00800	Northwest side of main building from parking lot looking southeast at the Extra Space Storage entrance.